

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:24CR289
)	
Plaintiff,)	JUDGE DONALD C. NUGENT
)	
v.)	
)	
MATTHEW MOTIL,)	<u>NOTICE OF RELATED CASES</u>
)	
Defendant.)	

SECURITIES AND EXCHANGE)	CASE NO.: 1:23CV1853
COMMISSION,)	
)	JUDGE JAMES S. GWIN
Plaintiff,)	
)	
v.)	
)	
MATTHEW MOTIL)	<u>NOTICE OF RELATED CASES</u>
NORTH SHORE EQUITY SALES, LLC,)	
d/b/a THE MARIE PAUL COMPANY;)	
NORTH SHORE EQUITY MANAGEMENT,)	
LLC)	
)	
Defendants,)	
)	
AMY DOUBRAVA MOTIL,)	
)	
Relief Defendant.)	
)	

The United States, by and through its counsel, Rebecca C. Lutzko, United States Attorney, and Erica D. Barnhill, Assistant United States Attorney, hereby gives notice, pursuant to Local Criminal Rule 57.9(b)(3), that the recently-filed Information in *United States v. Matthew Motil*, Case No. 1:24CR289, assigned to the Honorable Donald C. Nugent, is or might

be considered to be related to a civil case previously brought by the Securities and Exchange Commission (“SEC”) and assigned to the Honorable James S. Gwin, *Securities and Exchange Commission v. Matthew Motil et al.*, Case No. 1:23CV1853.¹

Although Local Crim. Rule 57.9 provides for reassignment of related cases, the Rule itself does not articulate a governing standard, nor does it define what a “related case” is. Rather, when filing a criminal case, the United States Attorney’s Office is required “in *any* case which is, *or might be considered*, related to another case, [to] file a motion/notice with both District Judges advising the Court of the relationship.” Local Crim. Rule 57.9(b)(3) (emphasis added).

Because the rule specifies the notice shall be filed in “any” case, the United States respectfully notifies this Court that the above-captioned cases, both of which name Matthew Motil as the primary defendant,² might be considered related under Local Crim. Rule 57.9(b)(3). Both the SEC’s Complaint and the criminal Information allege that Motil defrauded investors by operating a Ponzi-style real estate investment scheme over a number of years, using investor money to repay prior investors and to fund his lifestyle. See *United States v. Motil*, Case No. 1:24CR289 (R. 1: Information); see also *Securities and Exchange Commission v. Matthew Motil et al.*, Case No. 1:23CV1853 (R. 1: Complaint).

¹ The United States Attorney’s Office is not a party to the SEC case.

² The SEC’s civil case also names two of Motil’s corporate entities as defendants, and names Motil’s wife, Amy Motil, as a relief defendant. Motil is the sole defendant in the criminal matter.

Therefore, the United States respectfully submits this Notice of Related Cases.

Respectfully submitted,

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